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Counsel for Plaintiffs

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization,

Defendants.

Case No. CV01-22-06789

**MOTION FOR CONTEMPT AGAINST
AMMON BUNDY, PEOPLE'S RIGHTS
NETWORK, AND AMMON BUNDY FOR
GOVERNOR**

Plaintiffs, St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd.,
Chris Roth, Natasha D. Erickson, M.D., and Tracy W. Jungman, NP ("Plaintiffs"), by and
through their attorneys of record, Holland & Hart LLP, hereby move this Court to hold Ammon
Bundy, Ammon Bundy for Governor and People's Rights Network in contempt pursuant to
Idaho Code § 7-601 *et seq.* and Idaho Rule of Civil Procedure 75.

Plaintiffs seek their reasonable costs and attorney fees incurred in prosecuting the
contempt proceedings under Idaho Rule of Civil Procedure 75(m).

This Motion is supported by the pleadings and documents on file herein, along with the
Memorandum in Support of Motion for Contempt and the Affidavit of Jennifer Jensen filed
contemporaneously herewith.

Oral argument is requested.

DATED: October 20, 2023.

HOLLAND & HART LLP

By: /s/ Erik F. Stidham

Erik F. Stidham

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of October, 2023, I caused to be filed and served, via iCourt, a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
People's Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

☒ U.S. Mail
☐ Hand Delivered
☐ Overnight Mail
☒ Email/iCourt/eServe: aebundy@bundyfarms.com

Ammon Bundy
Ammon Bundy for Governor
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/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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